

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Case No. 2:18-cv-04177-NKL
)	
FOURTEEN MISCELLANEOUS)	
FIREARMS,)	
)	
MISCELLANEOUS ROUNDS OF)	
AMMUNITION,)	
)	
Defendants.)	

MOTION FOR STAY OF FORFEITURE

COMES NOW claimant Robert Bacon, by and through counsel Brydon Swearngen & England P.C. and moves pursuant to 18 U.S.C. §981(g)(2) for a stay of the civil forfeiture proceeding.

1. The United States of America has filed its Complaint for Forfeiture in the above-styled case seeking the forfeiture of firearms and ammunition seized from Robert Bacon (hereinafter called "Claimant") on or about May 4, 2018.
2. Claimant is the subject of a related criminal investigation or case by the United States Attorney's office of which the United States of America (hereinafter called "Government") is aware.
3. Claimant has standing to assert a claim in the civil forfeiture proceeding filed by the Government.

4. The continuation of the forfeiture proceeding will burden the right of the Claimant against self-incrimination in the related investigation or case.
5. Counsel for Claimant has spoken with Stacey Perkins Rock, Assistant United States Attorney regarding seeking a stay of the civil forfeiture proceeding. Ms. Perkins Rock has no objection to motion to stay the civil forfeiture proceeding.
6. Claimant further requests that the court enter an order to preserve the value of the property and protect the claimant's rights pursuant to 18 U.S.C. §981(g)(6).

WHEREFORE, Robert Bacon prays that the Court enter its Order staying this forfeiture action, entering its order to preserve the value of the property and protect claimant's rights, and for such other relief as the court deems just and proper in the interest of justice.

Respectfully submitted,

BRYDON SWEARENGEN & ENGLAND P.C.
By:

/s/ Scott A. Hamblin
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was sent by electronic case filing to all counsel of record on this 8th day of September, 2018.

/s/ Scott A. Hamblin